

Exhibit 3-2

Class 4 Master Ballot

**MASTER BALLOT FOR HOLDERS OF DIRECT
TALC PERSONAL INJURY CLAIMS IN CLASS 4**

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**MASTER BALLOT FOR HOLDERS OF DIRECT TALC
PERSONAL INJURY CLAIMS IN CLASS 4 VOTING ON AMENDED
CHAPTER 11 PLAN OF REORGANIZATION OF LTL MANAGEMENT LLC**

The above-captioned debtor (the “Debtor”) is soliciting votes from holders of Talc Personal Injury Claims on the *Amended Chapter 11 Plan of Reorganization of LTL Management LLC* [Dkt. 912] (together with all schedules and exhibits thereto, and as may be modified,

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

amended, or supplemented from time to time, the “Plan”),² which is described in greater detail in that certain disclosure statement with respect to the Plan [Dkt. •] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “Disclosure Statement”). The Plan and Disclosure Statement have been included in the package of materials containing this master ballot (this “Master Ballot”) and can be accessed free-of-charge at <https://dm.epiq11.com/ltl>.

On [_____, 2023], the United States Bankruptcy Court for the District of New Jersey (the “Bankruptcy Court”) entered an order (the “Solicitation Procedures Order”) approving the Disclosure Statement and procedures for soliciting votes to accept or reject the Plan (the “Solicitation Procedures”), as to the Debtor. The voting procedures set forth below apply to holders of Talc Personal Injury Claims against the Debtor.

You represent certain clients (“Clients”) that may hold Talc Personal Injury Claims that are not Indirect Talc Personal Injury Claims (“Direct Talc Personal Injury Claims”). You are receiving this Master Ballot because you previously elected in a certified plan solicitation directive to be used by attorneys to indicate how its Clients votes should be solicited (“Certified Plan Solicitation Directive”) that you will collect and record the votes of your Clients through customary and accepted practices, or that you have obtained authority to procedurally cast each of your Direct Talc Personal Injury Claim Client’s votes (provided that you have complied with the voting procedures set forth in the Disclosure Statement and Solicitation Procedures Order and each of your Clients has indicated an informed decision on such vote). To use this Master Ballot, you must meet all applicable standards to obtain an informed decision from your Clients. In addition, you must either (i) provide the Solicitation Package, either in hard copy or electronic format, to your Clients, or (ii) have requested that, for informational purposes, the Solicitation Agent serve Solicitation Packages (without a Ballot) on your Clients.

If the Plan is confirmed by the Bankruptcy Court it will be binding on your Talc Personal Injury Claims Clients whether or not your Clients vote and, if they vote, whether they vote in support of or to reject the Plan. The Plan provides for the issuance of a “Channeling Injunction” pursuant to sections 524(g) and 105(a) of the Bankruptcy Code. For a description of the causes of action to be enjoined and the identities of the entities that would be subject to these injunctions, see Section 7.10 of the Disclosure Statement and Article XI of the Plan. The Plan provides a mechanism by which Talc Personal Injury Claims against the Debtor will be channeled to a trust established pursuant to sections 524(g) and 105(a) of the Bankruptcy Code.

This Master Ballot is to be used by attorneys only for recording their Clients’ votes on the Plan for their Direct Talc Personal Injury Claims in Class 4. **Unless such time is extended by the Debtor or the Bankruptcy Court, this Master Ballot must be properly completed, signed, and returned to the Solicitation Agent so as to be received no later than 2023] at 4:00 p.m. (prevailing Eastern Time) (the “Voting Deadline”) in order for the votes on this Master Ballot to count. As set forth below, you will need to attach or otherwise submit an exhibit to this Master Ballot containing details of the Clients you represent and whose votes you are submitting pursuant to this Master Ballot (the “Exhibit”). To submit a Master**

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Plan.

Ballot and Exhibit through the Solicitation Agent’s electronic balloting platform, a Firm must set up an account ID and password. The platform will have the electronic Master Ballot form. The Firm will submit its Clients’ votes through the electronic Master Ballot form and will upload supporting documentation, if any, through the platform. The Solicitation Agent’s electronic balloting platform, available at <https://dm.epiq11.com/ltl>, is the sole manner in which Master Ballots will be accepted via electronic or online transmission. Master Ballots submitted by facsimile, email, or other means of electronic transmission will NOT be counted.

DOCUMENTS INCLUDED WITH THIS MASTER BALLOT.

You should have received the following documents with this Master Ballot (collectively, the “Solicitation Package”). **Please note that some of the following documents may be included on a USB flash drive included as part of your Solicitation Package.**

- a cover letter describing the contents of the Solicitation Package and the enclosed USB flash drive, and instructions for obtaining (free of charge) printed copies of the materials provided in electronic format;
- the Confirmation Hearing Notice (as defined in the Solicitation Procedures);
- the Disclosure Statement with all exhibits, including the Plan with its exhibits (to the extent such exhibits were filed with the Bankruptcy Court before the distribution of the Solicitation Package);
- the Solicitation Procedures Order (without exhibits);
- a pre-addressed, postage prepaid return envelope for your completed Ballot;
- a letter from the Debtor recommending the acceptance of the Plan;
- a letter from the AHC of Supporting Counsel recommending the acceptance of the Plan; and
- Client list in excel format.

If you have questions about this Ballot, or if you did not receive a copy of the Plan or any related materials, please contact Epiq Corporate Restructuring, LLC (the “Solicitation Agent”), at LTLVote@epiqglobal.com or at (888) 431-4056 (Toll-Free) or +1 (503) 822-6762 (International). **Information may also be obtained at <https://dm.epiq11.com/ltl>.**

Any admission of claims for purposes of voting on the Plan is not an admission of liability on the part of the Debtor or any other party for payment purposes.

BALLOT

Master Ballot for Voting on Plan of Reorganization of LTL Management LLC

PLEASE COMPLETE THE FOLLOWING:

Item 1 – Tabulation.

Please note that each holder of a Direct Talc Personal Injury Claim who votes must vote the entire amount of his or her claim to accept or reject the Plan. Any holder of a Direct Talc Personal Injury Claim who attempts partially to reject and partially to accept the Plan will not have their vote counted. If this Master Ballot is signed and timely received by the Solicitation Agent, but does not designate either acceptance or rejection or designates both acceptance and rejection of the Plan for any particular Claim, such vote will not be counted either as an acceptance or rejection of the Plan.

Please mark one of the boxes below and include the number of claimants voting to ACCEPT or to REJECT:

- ☐ All _____ (indicate number) claimants listed on the Exhibit accompanying this Master Ballot ACCEPT / vote in favor of the Plan.
- ☐ All _____ (indicate number) claimants listed on the Exhibit accompanying this Master Ballot REJECT / vote against the Plan.
- ☐ _____ (indicate number) claimants listed on the Exhibit accompanying this Master Ballot ACCEPT / vote in favor of the Plan, while _____ (indicate number) claimants listed on the exhibit accompanying this Master Ballot REJECT / vote against the Plan

Item 2 – List of Holders of Direct Talc Personal Injury Claims Represented by Attorney.

Please include as an exhibit to this Master Ballot (the “Exhibit”) the electronic Client List, in Excel or a comparable application included as part of the Solicitation Package. The Exhibit must conform to the list of Clients that the firm submitted to the Solicitation Agent in connection with its Certified Plan Solicitation Directive. If a firm becomes retained by additional clients following the submission of the Certified Plan Solicitation Directive, the firm must submit an additional Certified Plan Solicitation Directive Excel file for such additional Clients,³ which the Firm shall be deemed to have certified consistent with its original Client List. Such additional Solicitation Directive Excel file must be submitted to the Solicitation Agent **before** the firm submits a Master Ballot. The list of Clients included in the Exhibit must indicate for each claimant: (a) the last name of the claimant; (b) the first name of the claimant; (c) the

³ Such firm must inform the Solicitation Agent of their retention by additional Clients by emailing LTLVOTE@epiqglobal.com. The Solicitation Agent will exercise reasonable efforts to provide the firm with a supplemental Client List on which to record its Clients’ votes prior to the Voting Deadline.

last 4 digits of the Social Security Number of the claimant (if claimant is a U.S. citizen—if not a U.S. citizen or the claimant does not have a Social Security Number, so specify and provide the month, date, and year of birth of the claimant); (d) whether the claimant votes to ACCEPT / in favor of or to REJECT / against the Plan; and (e) if the claimant votes to REJECT / against the Plan, whether the claimant opts out of the releases contained in Section 11.3.2 of the Plan.

If you have any technical questions or need to arrange for special delivery of your Exhibit, please contact the Solicitation Agent at **LTLVote@epiqglobal.com** or at **(888) 431-4056 (Toll-Free) or +1 (503) 822-6762 (International)**.

Item 3 – Certifications, Acknowledgement, Signature, and Date.

- By signing this Master Ballot, the undersigned certifies, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following statements are true and correct:
 - I have been provided with a copy of the Confirmation Hearing Notice, the Disclosure Statement (with the Plan attached as an exhibit), the Solicitation Procedures Order, the Solicitation Procedures, and two letters, one from the Debtor and one from the AHC of Supporting Counsel, urging Claimants to vote to ACCEPT / vote in favor of the Plan.
 - Each of the Clients set forth on the Exhibit is represented by me and, through the execution and filing of this Master Ballot with the Solicitation Agent, I have collected and recorded the votes of my Clients through customary and accepted practices, or have obtained authority to procedurally cast each Clients' vote, and I have complied with all terms, voting procedures, and conditions set forth in the Disclosure Statement and Solicitation Procedures Order. Each of my Clients has indicated an informed decision on such vote.
 - I have either (i) provided the Solicitation Package, either in hard copy or electronic format, to each of my Clients in a timely manner, or (ii) requested that the Solicitation Agent serve Solicitation Packages (without a Ballot) on my Clients in the form that my Clients have requested.
 - I have a reasonable belief that each holder of a Direct Talc Personal Injury Claim listed on the Exhibit accompanying this Master Ballot, as of the Voting Record Date (as defined in the Solicitation Procedures Order), has a Direct Talc Personal Injury Claim in Class 4.
 - I acknowledge that a vote to accept the Plan constitutes acceptance of the treatment of each Client as a holder of a Direct Talc Personal Claim in Class 4.
 - I have a reasonable belief that the holder of each Direct Talc Personal Injury Claim identified on the Exhibit has a diagnosis of ovarian, fallopian tube, primary peritoneal, uterine and cervical cancers (each a "Gynecologic Cancer") or malignant mesothelioma (pleural (except well-differentiated papillary mesothelioma), peritoneal, pericardial or testicular) ("Mesothelioma") supported

by medical records or similar documentation regarding the person who has or had such disease.⁴

- I have a reasonable belief that the holder of each Direct Talc Personal Injury Claim identified on the Exhibit:
 - (1) consistently used one or more products formulated, manufactured, distributed, and/or sold by the Debtor and/or any LTL Corporate Party (as defined in the Plan) containing talcum powder (collectively “J&J Talc Products”) in the perineal area for a minimum of four consecutive years; and (2) was newly diagnosed with a Gynecologic Cancer at least ten years following first use of J&J Talc Products; or
 - (1) consistently used J&J Talc Products for a minimum of four consecutive years; (2) was newly diagnosed with Mesothelioma at least ten years following first use of J&J Talc Products; (3) has not alleged and will not allege that exposure to asbestos or alleged asbestos contamination in any product other than one or more J&J Talc Products or other talcum powder product(s) caused or contributed to his/her Mesothelioma; and (4) has not sought compensation for, will not seek compensation for, and has not previously been compensated for alleged exposure to asbestos from any source other than through one or more J&J Talc Products or other talcum powder product(s).

Print or Type Name of Attorney:

Name of Law Firm:

Attorney Signature:

Street Address:

City, State, and ZIP Code:

Telephone Number:

Email Address of Attorney/Signatory:

Date:

The entire Exhibit accompanying this Master Ballot must be prepared and returned with this completed Master Ballot to the Solicitation Agent.

⁴ The holder of a Direct Talc Personal Injury Claim and/or such holder’s attorney should **NOT** submit any documentation—medical or otherwise, with the Ballot.

DO NOT INCLUDE MEDICAL RECORDS WITH THIS BALLOT.
MEDICAL RECORDS CANNOT BE RETURNED BY THE SOLICITATION AGENT.

**IF THIS MASTER BALLOT IS NOT RECEIVED BY THE SOLICITATION
AGENT BY [_____, 2023] AT 4:00 P.M. (PREVAILING
EASTERN TIME), YOUR VOTE MAY NOT BE COUNTED.**

INSTRUCTIONS FOR COMPLETING YOUR BALLOT

1. The Master Ballot is submitted to you, as an attorney for holders of Direct Talc Personal Injury Claims against the Debtor, to solicit, collect, and record the votes of your Direct Talc Personal Claim Clients to accept or reject the Plan. The Disclosure Statement and Plan are also being provided to you. PLEASE READ ALL DOCUMENTS CAREFULLY BEFORE COMPLETING THE MASTER BALLOT, INCLUDING THE SOLICITATION PROCEDURES THAT ARE INCLUDED WITHIN THE SOLICITATION PACKAGE THAT ACCOMPANIES THESE INSTRUCTIONS. THE SOLICITATION PROCEDURES CONTAIN IMPORTANT INFORMATION REGARDING THE BALLOTING PROCESS. PLEASE READ THE SOLICITATION PROCEDURES BEFORE SUBMITTING THIS MASTER BALLOT.

2. The Master Ballot is to be used by attorneys only for soliciting, collecting, recording and submitting the votes of holders of Direct Talc Personal Injury Claims in Class 4. You may be required to provide evidence that you have properly solicited votes to accept or reject the Plan from holders of Direct Talc Personal Injury Claims identified on the Exhibit to this Master Ballot.

3. To be entitled to vote on the Plan, a holder of a Direct Talc Personal Injury Claim in Class 4 (either directly or through his or her attorney or agent) must be able to certify that such holder (a) reasonably believes it has a Direct Talc Personal Injury Claim against the Debtor as of the Voting Record Date (as defined in the Solicitation Procedures Order), (b) has a claim based on a diagnosis of ovarian, fallopian tube, primary peritoneal, uterine and cervical cancers (each a “Gynecologic Cancer”) or malignant mesothelioma (pleural (except well-differentiated papillary mesothelioma), peritoneal, pericardial or testicular) (“Mesothelioma”) supported by medical records or similar documentation regarding the person who has or had such disease;⁵ and (c) either (i)(1) consistently used one or more products formulated, manufactured, distributed, and/or sold by the Debtor and/or any LTL Corporate Party (as defined in the Plan) containing talcum powder (collectively “J&J Talc Products”) in the perineal area for a minimum of four consecutive years; and (ii) was newly diagnosed with a Gynecologic Cancer at least ten years following first use of J&J Talc Products; or (ii)(1) consistently used J&J Talc Products for a minimum of four consecutive years; (2) was newly diagnosed with Mesothelioma at least ten years following first use of J&J Talc Products; (3) has not alleged and will not allege that exposure to asbestos or alleged asbestos contamination in any product other than one or more J&J Talc Products or other talcum powder product(s) caused or contributed to his/her Mesothelioma; and (4) has not sought compensation for, will not seek compensation for, and has not previously been compensated for alleged exposure to asbestos from any source other than through one or more J&J Talc Products or other talcum powder product(s).

4. To have the votes reflected on the Master Ballot counted for purposes of voting on the Plan, the Master Ballot must be completed, signed, and either (a) submitted through the Solicitation Agent’s electronic balloting platform (such electronically completed Ballots, “E-Ballots”) or (b) returned so that it is received by the Solicitation Agent at the address set forth

⁵ The holder of a Direct Talc Personal Injury Claim and/or such holder’s attorney should **NOT** submit any documentation—medical or otherwise, with the Ballot.

above not later than the Voting Deadline. Electronic submission of Master Ballots through the E-Ballot platform on the Solicitation Agent's website is the only acceptable means of electronic submissions. To submit a Master Ballot and Exhibit through the Solicitation Agent's electronic balloting platform, a Firm must set up an account ID and password. The platform will have the electronic Master Ballot form. The Firm will submit its Clients' votes through the electronic Master Ballot form and will upload supporting documentation, if any, through the platform. Master Ballots will not be accepted by telecopy, facsimile transmission, email, or other electronic submission. If a Master Ballot is received after the Voting Deadline, it may not be counted. An envelope addressed to the Solicitation Agent is enclosed for your convenience. If the Master Ballot is not signed on the appropriate lines, the Master Ballot will not be valid or counted as having been cast.

5. The Master Ballot may not be used for any purposes other than to transmit votes on the Plan.

6. Multiple Master Ballots may be completed and delivered to the Solicitation Agent. Subject to the terms of the Solicitation Procedures, votes reflected by multiple Master Ballots will be counted except to the extent that they are duplicative of other Master Ballots. If two or more such ballots submitted by the same firm are inconsistent, the last-dated Master Ballot received before the Voting Deadline will, to the extent of such inconsistency, govern unless otherwise ordered by the Bankruptcy Court. If more than one Master Ballot is submitted and the last such ballot supplements rather than supersedes earlier Master Ballot(s), please designate the subsequent Master Ballot(s) as "Supplemental" and clearly mark which of those votes reflected thereon are additional votes. Notwithstanding the foregoing, if the same holder of a Direct Talc Personal Injury Claim appears on more than one Master Ballot, the Solicitation Agent will attempt to coordinate with the respective firms to cure the discrepancy. However, if the firms are unsuccessful in curing the discrepancy, the vote of the holder appearing on both Master Ballots will be counted only once and only if such votes are consistent with respect to acceptance or rejection of the Plan; in the event that the votes are not consistent, none of the votes will be counted.

7. Each holder of a Direct Talc Personal Injury Claim that votes must vote his or her entire claim either to ACCEPT / in favor of or to REJECT / against the Plan. A holder of a Direct Talc Personal Injury Claim may not split his or her vote. Accordingly, the votes of any holder of a Direct Talc Personal Injury Claim who purports partially to accept and partially to reject the Plan will not be counted.

8. If the Master Ballot is signed and timely sent to the Solicitation Agent, but does not designate either acceptance or rejection, or designates both acceptance and rejection, of the Plan for any particular Claim listed on the Exhibit (as defined below) accompanying the Master Ballot, then the Solicitation Agent may, at its discretion, either contact the party submitting the Master Ballot in order to cure the defect on the Master Ballot or such Claim will not be counted either as an acceptance or rejection of the Plan.

9. **To complete the Master Ballot properly, you must follow the procedures described below:**

Item 1 of the Master Ballot asks you to indicate how many holders of Direct Talc Personal Injury Claims listed on the Exhibit accept or reject the Plan. If all of your clients have indicated that they ACCEPT / vote in favor of the Plan, please check the box indicating same. If all of your clients have indicated that they REJECT / vote against the Plan, please check the box indicating same. If some of your clients have indicated that they ACCEPT / vote in favor of the Plan, while others have indicated that they REJECT / vote against the Plan, please check the box indicating the same and be certain to specify on the Exhibit which clients have accepted the Plan and which clients have rejected the Plan.

Item 2 of the Master Ballot requires that you prepare a list of each holder of a Direct Talc Personal Injury Claim that you represent in substantially the same format as provided with the Master Ballot that will become an exhibit to the Master Ballot (the "Exhibit"). The Exhibit must (i) be in Microsoft Excel or comparable electronic format that may be submitted through the Solicitation Agent's E-Ballot platform (with respect to a Master Ballot that is submitted through the Solicitation Agent's E-Ballot platform) or mailed to the Solicitation Agent on a USB flash drive (with respect to a Master Ballot that is submitted to the Solicitation Agent in hard copy) and (ii) (a) list all holders of Direct Talc Personal Injury Claims whose votes you are submitting by first and last name, the last four digits of such holder's Social Security Number (if the holder is a US citizen) or, for holders who do not have a Social Security Number, the month, date, and year of birth, (b) state whether such holder accepts or rejects the Plan, and, (c) if such holder votes to reject the Plan, state whether such holder opts out of the releases contained in Section 11.3.2 of the Plan (as described in greater detail below). Section 11.3.2 of the Plan contains the following release provision:

Releases by Holders of Claims.

As of the Effective Date, for good and valuable consideration, the adequacy of which is hereby confirmed, including the service of the Released Parties before and during the Chapter 11 Case to facilitate the implementation of the Talc Personal Injury Trust, the Released Parties shall be deemed conclusively, absolutely, unconditionally, irrevocably, and forever released, to the maximum extent permitted by law, as such law may be extended subsequent to the Effective Date, by the Releasing Claim Holders from any and all Claims, counterclaims, disputes, obligations, suits, judgments, damages, demands, debts, rights, causes of action, liens, remedies, losses, contributions, indemnities, costs, liabilities, fees (including attorneys' fees), and expenses whatsoever, including any derivative claims, asserted or assertable on behalf of the Debtor or the Estate (including any Recovery Actions), whether liquidated or unliquidated, fixed or contingent, matured or unmatured, known or unknown, foreseen or unforeseen, asserted or unasserted, accrued or unaccrued, existing or hereinafter arising, whether in law or equity, whether sounding in tort or contract, whether arising under federal or state statutory or common law, or any other applicable international, foreign, or domestic law, rule, statute, regulation, treaty, right, duty, requirement or otherwise, that such holders or their estates, Affiliates, heirs, executors, administrators, successors, assigns, managers, accountants, attorneys, representatives, consultants, agents, and any other Persons or parties claiming under or through them would have been legally entitled to assert in their own right (whether individually or collectively), or on

behalf of the holder of any Claim or Interest or other Person, based on, arising out of, or in any way relating to, in whole or in part, the Debtor (as it existed prior to or after the Petition Date), the 2021 Corporate Restructuring, the 2021 Chapter 11 Case, the Prepetition Funding Agreement Modifications, the Estate, the Chapter 11 Case, the purchase, sale, or rescission of the purchase or sale of any security of the Debtor, the subject matter of, or the transactions or events giving rise to, any Claim or Interest that is treated in the Plan, the business or contractual arrangements or interactions (including the exercise of any common law or contractual rights of setoff or recoupment at any time on or prior to the Effective Date) between the Debtor, on the one hand, and any other Released Party, on the other hand, the restructuring of any Claim or Interest before or during the Chapter 11 Case, the Disclosure Statement, the Plan, and related agreements, instruments, and other documents, and the negotiation, formulation, preparation, or implementation thereof, the solicitation of votes with respect to the Plan, or any other related act or omission. Notwithstanding the foregoing, claims or causes of action against a Released Party arising out of or relating to any act or omission of such Released Party prior to the Effective Date that is determined by Final Order of the Bankruptcy Court or any other court of competent jurisdiction to have constituted a criminal act, actual fraud, gross negligence, or willful misconduct, including findings after the Effective Date, are not released pursuant to this Section 11.3.2. For the avoidance of doubt, nothing contained in this Section 11.3.2 shall release or otherwise affect the obligations of any Person to be performed from and after the Effective Date under the Funding Agreement, the Support Agreement, or the Cash Contributions Parent Guarantee or any other Plan Document to which it is a party.

IF THE PLAN BECOMES EFFECTIVE, HOLDERS OF DIRECT TALC PERSONAL INJURY CLAIMS ARE DEEMED TO PROVIDE THE RELEASES CONTAINED IN SECTION 11.3.2 OF THE PLAN, AS SET FORTH ABOVE. YOU MAY REFLECT THE DECISION OF A HOLDER TO OPT OUT OF THE RELEASES BY STATING SO IN THE EXHIBIT ONLY IF THE HOLDER VOTES TO REJECT THE PLAN. IF THE HOLDER (I) VOTES TO ACCEPT THE PLAN, (II) DOES NOT SUBMIT A BALLOT TO ACCEPT OR REJECT THE PLAN, OR (III) REJECTS THE PLAN BUT DOES NOT INDICATE THAT THEY OPT OUT OF THE RELEASE PROVISIONS OF THE PLAN, THE HOLDER WILL BE DEEMED TO HAVE GRANTED THE RELEASES IN SECTION 11.3.2 OF THE PLAN.

Item 3 of the Master Ballot contains certifications that are required for you to solicit, collect, record and submit votes of one or more holders of Direct Talc Personal Injury Claims. Please ensure that you have read and understood the certifications before signing the Master Ballot. If, since the submission of the Certified Plan Solicitation Directive, you have become unable to make the certification as to compliance with the requirement that you solicit, collect, record and submit votes of any holder of a Direct Talc Personal Injury Claim you represent, you must notify the Solicitation Agent and provide the Solicitation Agent with the names, addresses, and the last four digits of the Social Security Numbers (for citizens of the United States) or, for holders who do not have a Social Security Number, the month, date, and year of birth of any such holder, as soon as possible, and the Solicitation Agent will exercise reasonable efforts to distribute a Solicitation Package to such Client as soon as reasonably practicable.

Sign the Master Ballot and provide your name, mailing address and email address where indicated. Contact the Solicitation Agent if you need additional information or copies of any documents contained in the Solicitation Package. Return the completed, executed Master Ballot so as to be actually received by the Solicitation Agent before the Voting Deadline.

10. If Submitting Your Vote Through the E-Ballot Platform:

The Solicitation Agent will accept Ballots if properly completed through the E Ballot platform. To submit your Ballot via the E-Ballot platform, visit <https://dm.epiq11.com/ltl>, click on the “Submit E-Ballot” section of the website and follow the instructions to submit your Ballot.

IMPORTANT NOTE: You will need the following information to retrieve and submit your customized electronic Ballot:

Unique E-Ballot ID#: [_____]

The Solicitation Agent’s E-Ballot platform is the sole manner in which Ballots will be accepted via electronic or online transmission. Ballots submitted by facsimile, email or other means of electronic transmission will not be counted.

Each E-Ballot ID# is to be used solely for voting only those Claims described in Item 1 of your electronic Ballot. Please complete and submit an electronic Ballot for each E-Ballot ID# you receive, as applicable. Creditors who cast a Ballot using the E-Ballot platform should NOT also submit a paper Ballot. Properly submitted E-Ballots shall be deemed to contain an original signature.

If your Ballot is not received by the Solicitation Agent on or before the Voting Deadline, and such Voting Deadline is not extended by the Debtor as noted above, your vote will not be counted.

11. If Submitting Your Vote through the Mail, Overnight Courier, or via Hand Delivery:

Submit your completed and signed Ballot by mail using the envelope included in the Solicitation Package to:

If by first class mail: LTL Management LLC c/o Epiq Ballot Processing Center P.O. Box 4422 Beaverton, OR 97076-4422	If by overnight courier, or hand delivery to: LTL Management LLC c/o Epiq Ballot Processing 10300 SW Allen Boulevard Beaverton, OR 97005
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12. Each holder of a Direct Talc Personal Injury Claim will have a single Claim for voting purposes, which Claim has been allowed in the amount of \$1.00 per claimant for purposes of voting on the Plan in accordance with certain tabulation rules set forth in the

Solicitation Procedures approved by the Bankruptcy Court. The allowance of Direct Talc Personal Injury Claims in the amount of \$1.00 is solely for voting purposes and does not constitute an allowance of such Claim for purposes of distribution under the Trust Distribution Procedures and is not binding on claimants, or the Talc Personal Injury Trust for any purpose other than voting on the Plan.

**IF YOU HAVE ANY QUESTIONS REGARDING THE MASTER BALLOT,
BELIEVE YOU MAY HAVE RECEIVED AN INCORRECT BALLOT,
OR IF YOU DID NOT RECEIVE A COPY OF ANY OF
THE DOCUMENTS DESCRIBED IN THESE INSTRUCTIONS,
PLEASE CONTACT THE SOLICITATION AGENT AT:**

**TELEPHONE: (888) 431-4056 (TOLL-FREE) OR +1 (503) 822-6762
(INTERNATIONAL)
EMAIL: LTLVOTE@EPIQGLOBAL.COM
OR VISIT [HTTPS://DM.EPIQ11.COM/LTL](https://DM.EPIQ11.COM/LTL)**